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March 2, 2022

## BY ECF

The Honorable Edgardo Ramos United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: *United States v. Trevor Milton* (1:21-cr-00478-ER)

## Dear Judge Ramos:

I write on behalf of Mr. Milton to clarify the defense's position as set forth in the letter filed yesterday by the government (ECF 91). Mr. Milton joins the government's request for a conference to discuss the setting of a revised and firm trial date, and Mr. Milton respectfully asks the Court to hold that conference as soon as practicable. Mr. Milton consents to the tolling of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the date of the next conference.

Mr. Milton objects, however, to the tolling of the Speedy Trial Act through July 1, 2022. Mr. Milton anticipates requesting that trial commence well in advance of July 1, while allowing the Court sufficient time to consider all pending motions and otherwise be consistent with the Court's calendar.

Respectfully,

/s/

Bradley J. Bondi

CAHILL GORDON & REINDEL LLP

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cc:

Marc Mukasey Counsel of Record (via ECF)